

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 4:15-cr-175 RWS
)
PAUL G. PARKER,)
)
Defendant.)

THE UNITED STATES' SENTENCING MEMORANDUM

Paul Parker was a salesman. Between July 2012 and October 2013, Parker sold life insurance annuities, even though he no longer held an insurance license. As a salesman, Parker developed a relationship of trust and confidence with his customers. Parker sold those customers insurance products that they relied upon as safe investments. But rather than invest the money as promised, Parker spent his victims' money on himself, including his personal expenses and gambling. Parker also used money from later investors to cover the losses he had caused to prior investors, all in a Ponzi-like manner. Ultimately, Parker caused two of those investors more than \$200,000.00 in losses, after covering the losses of two early investors with the money he had stolen from the latter two. He also failed to file federal and state taxes throughout the fraud, causing additional losses to the treasuries of the United States and the State of Missouri.

Although these are serious crimes, they are crimes for which Parker has taken full responsibility. Through his attorney, Parker approached the government while its investigation was still ongoing about the possibility of pleading guilty by way of information. Parker has remained fully cooperative with the government since first becoming aware of the investigation, and he has consistently expressed remorse for his actions and a desire to make right by his

victims. The government is convinced that Parker's remorse is genuine and that he sincerely regrets his criminal acts.

For these reasons, the United States respectfully requests that the Court sentence Parker to a term of imprisonment within the Guidelines range calculated in the PSIR (Doc. # 18) of 46 to 57 months. The United States submits that such a sentence is sufficient but not greater than necessary to serve the purposes of punishment set forth in 18 U.S.C. § 3553(a).

Dated: July 6, 2015

Respectfully submitted,

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/s/ Richard E. Finneran
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CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2015 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

s/ Richard E. Finneran
RICHARD E. FINNERAN, #60768MO
Assistant United States Attorney